

United States District Court  
for  
Puerto Rico

Jaime A. Diong @ell

Case No. 22-cv-1024(SCC)

✓.

Jury Trial ☒ Yes ☐ No

Puerto Rico Aqueduct and  
Sewer Authority et. als

Complaint for a civil case

I. The parties for this Complaint

A. The plaintiff

1. Jaime A. Diong @ell

PO box 9793

San Juan, PR 00908

787-447-2424

Jaimeadiong@ell@mail.com

B. The Defendants

1. Puerto Rico Aqueduct and Sewer Authority et. als  
604 ave. barbosa edif. Sergio Cuevas Bustamante  
Hato Rey, PR San Juan.



2. Mrs. Doriel Pagan Crespo, executive director  
in His Official Capacity, in His Individual Capacity  
604 ave. barbosa edif. Sergio Cuevas  
Bustamante Hato Rey, San Juan PR  
787-620-2277
3. Mr. Edwin Rivera Cardona, labor relations employee  
in His Official Capacity, in His Individual Capacity  
604 ave. barbosa edif. Sergio Cuevas Bustamante  
Hato Rey, San Juan PR  
787-620-2277
4. Mrs. Arínez Medina Resto, labor relations director  
in His Official Capacity, in His Individual Capacity  
604 ave. barbosa edif. Sergio Cuevas Bustamante  
Hato Rey, San Juan PR  
787-620-2277
5. Mrs. Glorimar Atienza Acaro, Human Resources Director  
in His Official Capacity, in His Individual Capacity  
604 ave. barbosa edif. Sergio Cuevas Bustamante  
Hato Rey, San Juan PR  
787-620-2277
6. Mrs. Raquel Matas Roldan, Legal Division Director  
in His Official Capacity, in His Individual Capacity  
604 ave. barbosa edif. Sergio Cuevas Bustamante  
Hato Rey, San Juan PR. 787-620-2277



## II. Basis for Jurisdiction

What is the basis for federal Court jurisdiction?

☒ Federal question ☐ Diversity of Citizenship

A. if the basis for jurisdiction is a federal Question list the specific federal statutes, and or provisions of the United States Constitution that are issue in this case.

1. employee retirement income security Act  
29 USC 1132

2. labor Management relations

3. other labor litigations

4. other civil rights

5. other personal property

6. Social Security

7. Constitutional rights

8. Damages



B. if the basis for jurisdiction is Diversity of Citizenship

n/a

C. the Amount in Controversy the Plaintiff claims the defendant owes is more than \$75,000 not counting interest and others, damages.

### III. Statement of Claim

1. That Mr. Edwin RIVERA Cardona employee of the labor relations area of the Puerto Rico Aqueduct and Sewer Authority, executed a false Affidavit on the grounds of a place where physically Mr. James A. Diagonelli was never.

2. That as a consequence Mr. Jorge Rodriguez Ruiz sign a letter of Summary dismissal without any appeal forum, the dismissal letter signed by Jorge Rodriguez Ruiz never established a forum to appeal his signature on the paper within a period of time according to contractual provisions in abuse of a political chair, in violation of my due process of law, to my human rights, to my constitutional rights, to my personal rights, in a Society of Humans, of Persons.



3. That Mr. Luis R. Cabrera after abandoned his functions and duties at 11:06 pm of the 19th February of 2004. in the Telephone Call Center Puerto Rico Agueduct and Sewer Authority 604 016. Barbosa, to cover it up Edwin Rivera Cardona fabricated a false affidavit on the grounds of a place where physically Mr. Jaime A. Diaz Orellana was never.
4. That prior to the dismissal letter there was never verbal or written communication about the Manufactured process created in Human Resources and labor relations area, by Edwin Rivera Cardona on the grounds of a place where I was never, Mr. Rivera Cardona Manufactured, fabricated a new Summary dismissal from his status of employee of labor relation area other more in his record as labor relation employee.
5. That as a consequence Mr. Jaime A. Diaz Orellana go to the established forum with primary and exclusive jurisdiction the Puerto Rico labor relation board, the exclusive forum.
6. That as a consequence the Puerto Rico labor relation board adjudicate the case in favor of Mr. Jaime A. Diaz Orellana.



7. That as recent as 5 of November of 2021 the Court of appeals for Puerto Rico notified Amended resolution on the resolution of Mr. Jaime A. Dominguez to the Puerto Rico Aqueduct and Sewer Authority.
8. That the notification was received by Mr. Edwin Rivera Cardona the person with Mode and facilitated the affidavit and employee of labor relation area who refuses reinstatement on my job.
9. That the notification was received by Mrs. Daniel Pagan Crespo Executive Director of the Puerto Rico Aqueduct and Sewer Authority who refuses reinstatement on my job.
10. That the notification was received by Mrs. Aina Medina Rosio Director of labor relations of the Puerto Rico Aqueduct and Sewer Authority who refuses reinstatement on my job.
11. That the notification was received by Mrs. Glorimar Ortiz Ocasio Human Resources director, who refuses reinstatement on my job.



12. That the notification was received by Mrs. Raquel Maras Polon Director of Legal Division of the Puerto Rico Aqueduct and Sewer Authority who refuses reinstatement on my job.

13. That even though all of them have been notified they refused to initiate the process of restoration depriving me of my right to a pension, depriving me of my right to contribute to my social security, depriving me to the equal protection of the laws, depriving me of my constitutional right to work, depriving me of my constitutional rights, depriving me of my right to worker contribution, depriving me of my right to contribute to the federal government, depriving me of wages, depriving me to contribute to my retirement, depriving of my property my right to work, causing more damages to existing ones unnecessarily, causing the loss of a home to live, abusing human rights from a political affair.

14. That as a consequence of the refusal of Edwin Rivera Cardona, Doriel Pagan Crespo, Arlene Medina Rosio, Gloria Ortiz Long Ocasio



Request Makes Demand for all of them Today  
 I am Homeless living inside a Motor Vehicle  
 They Acted and Act in bad faith, with  
 ego problems, in negligence, knowingly  
 hiding behind the legal figure of the  
 Corporation with arrogance and personal  
 Malice Towards George A. Dingler II,  
 trying to condemn a Human Being to permanent  
 indigence, Homelessness in the life.

#### IV Relief

I am requesting from a jury to order  
 my immediate restitution to the  
 Puerto Rico Aguardiente and Sabor, Authenticity  
 my job with all the benefits inherent to  
 my restitution, I am requesting from a jury  
 order the payment of the loss of my  
 personal house, I am requesting from a jury  
 order the payment of all the damages to  
 my personal life, in accordance, the defense  
 w/s owes is more than \$75,000.00

I am requesting a jury trial



## V Certification and Oath

I certify to the best of my knowledge  
the information that it is in this  
complaint.

Jaime A. Diaz (J)

PO Box 9793

San Juan, PR, 00908

787-447-2424

JaimeaDiazDella@gmail.com

12 of January of 2022